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June 15, 2021


The application is GRANTED. By **July 30, 2021**, Defendants shall file their motion to dismiss. By **August 20, 2021**, Plaintiff shall file his opposition. By **August 27, 2021**, Defendants shall file their reply. All submissions shall be per the Individual Rules. No further extensions will be granted absent extraordinary circumstances.

VIA ECF

Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED

Dated: June 17, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Mohammed Donzo v. City of New York, et al.
Docket No. 21 CV 00629 (LGS)
Law Dept. No. 2021-005685

Dear Judge Schofield:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, assigned to represent Defendants City of New York, New York City Police Department, James P. O'Neill, former NYPD Commissioner, and Dermot P. Shea, Police Commissioner, and Sgt. Allison Mullen (collectively "defendants") in the above-referenced matter.

I respectfully submit this letter to request an adjournment of the time for defendants to file its motion to dismiss. This is defendants' first request for an adjournment. Pursuant to Your Honor's Order dated June 9, 2021, Defendant's motion to dismiss is due on June 30, 2021. This extension is necessary because, as has been widely reported, our office had a complete loss of technological access and resources beginning June 6, 2021. Limited access to such resources was only granted to me yesterday afternoon, on June 15, 2021. Accordingly, prior to today, I had been unable to receive emails, notifications of Your Honor's June 9, 2021 order, or access any files, as I did not have access to my work product, relevant documents, or e-mail. Additionally, Plaintiff's Counsel agrees with this request. Accordingly, Defendant proposes the following briefing schedule: Defendant's motion to dismiss due on July 30, 2021, Plaintiff's opposition due on August 20, 2021, and Defendant's Reply due on August 27, 2021.

Defendants are requesting an adjournment to July 30, 2021 because our office continues to have limited access to remote files, which only includes emails. As such, Defendants respectfully request that Your Honor grant this great in light of the above. Plaintiff's counsel has consented to this briefing schedule.

Respectfully submitted,

/s/ *Ryan Nasim*

Ryan Nasim

Assistant Corporation Counsel

CC: Mustapha Ndanusa (via ECF and e-mail)